

**List of Settlement Demands for Bitgood, et al.**

The parties will jointly agree to all of the following:

1. Permanent injunction enjoining Defendants Michael Joseph Bitgood a/k/a “Michael Easton,” Richard P. Jones, Susan C. Norman, and Brad Beers (collectively, “Defendants”) from using, directly or indirectly, in any manner: the trademarks owned by Plaintiff Lewis Brisbois Bisgaard & Smith, LLP; the name Lewis Brisbois Bisgaard & Smith, LLP; the name Lewis Brisbois; and/or the initials “LB” or “LBBS” or any variation or derivative of those names in any manner and for any purpose.
2. Permanent injunction enjoining each and every Defendant from holding themselves out as members of, representatives of, or otherwise having any relationship with or to Lewis Brisbois Bisgaard & Smith, LLP in the past or future or as having ever been affiliated in any way with Lewis Brisbois Bisgaard & Smith, LLP.
3. Agreement to wind up and dissolve the domestic “Lewis Brisbois Bisgaard & Smith, LLP” entity that was formed by the Defendants, and to forfeit Defendants’ “mediation and arbitration” company and the assumed name of Lewis Brisbois Bisgaard & Smith, LLP.
4. An agreed order vacating Associate Judge Lewis White’s September 13, 2022 order granting the motion to show authority and remove David Oubre and Lewis Brisbois Bisgaard & Smith, LLP as counsel for Karina Martinez, Mariana Sullivan, and Imperial Lofts, LLC in Cause No. 22-CCV-070378, *Jones, et al. v. Martinez, et al.*, in the County Court at Law No. 3 of Fort Bend County, Texas.
5. An agreed order vacating Associate Judge Lewis White’s September 27, 2022 Findings of Fact and Conclusions of Law related to Associate Judge White’s September 13, 2022 order granting the motion to show authority in Cause No. 22-CCV-070378, *Jones, et al. v. Martinez, et al.*, in the County Court at Law No. 3 of Fort Bend County, Texas.
6. Entry of judgment in Cause No. 22-CCV-070378, *Jones, et al. v. Martinez, et al.*, in the County Court at Law No. 3 of Fort Bend County, Texas that grants Lewis Brisbois Bisgaard & Smith, LLP’s declaratory judgment and finds that:
  - a. Lewis Brisbois Bisgaard & Smith, LLP is and at all times since at least 2009 has been authorized to conduct business in the State of Texas; and
  - b. David Oubre is and at all times since 1992 has been licensed to practice law in the State of Texas and a member in good standing of the State Bar of Texas.
7. Dismiss all claims for relief of any nature against David Oubre, Lewis Brisbois Bisgaard & Smith, LLP, and any other member, associate, or employee of Lewis Brisbois Bisgaard & Smith, LLP in Cause No. 22-CCV-070378, *Jones, et al. v. Martinez, et al.*, in the County Court at Law No. 3 of Fort Bend County with each party to bear its own costs and attorneys’ fees.

8. Permanent injunction enjoining each and every Defendant from making any allegations and disparaging remarks against David Oubre, Lewis Brisbois Bisgaard & Smith, LLP, or any other member, associate, or employee of Lewis Brisbois Bisgaard & Smith, LLP that may cast the Oubre, the firm, or any other member, associate, or employee of the firm in a negative or disparaging light.
9. Repayment of Lewis Brisbois Bisgaard & Smith, LLP's taxable court costs of \$402.00 for having to file Civil Action No. 4:22-cv-3279, *Lewis Brisbois Bisgaard & Smith, LLP v. Michael Joseph Bitgood a/k/a "Michael Easton," et al.*, in the United States District Court for the Southern District of Texas, Houston Division.
10. Each and every Defendant will agree to provide defense and indemnity from or for any claim or damages alleged by any person or entity based upon, resulting or arising from, or related to any Defendant's use of: the trademarks owned by Plaintiff; the name Lewis Brisbois Bisgaard & Smith, LLP; the name Lewis Brisbois; and/or the initials "LB" or "LBBS" or any variation or derivative of those names in any manner and for any purpose.